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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UKRVAKTSINA, a Ukrainian state-owned enterprise,

Case No. 10-CV-6297-AA

Plaintiff,

v.

OLDEN GROUP, LLC, an Oregon limited liability company; and INTERFARM, LLC, a Ukrainian company,

DECLARATION OF ZOË NEWMAN IN SUPPORT OF PLAINTIFF'S MOTION TO REQUIRE PROOF OF DECLARANT OLEG YAROSCHUK'S EXISTENCE AND IDENTITY

Defendants.

I, Zoë Newman, being over the age of 18 years, declare that the following information is based upon my personal knowledge and is true and correct:

1. I am a chartered financial accountant in the United Kingdom and serve as managing director of financial investigations at Kroll, Inc., the international investigative firm.

2. I make this declaration in support of Plaintiff's Motion to Require Proof of Declarant Oleg Yaroschuk's Existence and Identity.

3. The allegations set forth in Plaintiff Ukravktsina's First Amended Complaint in the above-captioned matter came to light as a result of an international investigation that was authorized by the Government of Ukraine.

4. Kroll worked with the United States law firms of Akin Gump and Trout Cacheris to conduct the international investigation.

5. I led a team of Kroll's investigators and forensic accountants in conducting the investigation in Kyiv and London.

6. Research performed during the course of the investigation provided reason to believe that Oleg Yaroschuk, a purported director of Defendant Olden Group, LLC, is fictitious or is using a false name.

7. Kroll ordered searches of public records in Ukraine. Such databases contained no record of an individual named Oleg Yaroschuk in Ukraine.

8. Kroll also searched databases containing corporate records and personal information in the United States. Such databases contained a record of one individual named Oleg Yaroschuk, but that individual did not appear to be associated with Olden Group.

9. Information relating to individuals named Oleg Yaroschuk was found in Russian public records, but no such information linked an Oleg Yaroschuk to Olden Group.

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10. In sum, Kroll could not find any trace of an individual named Oleg Yaroschuk who serves as a director of Olden Group.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 10 day of March, 2011.

London, UK

By Zoë Newman
ZOË NEWMAN